



THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

JAMES E. JOHNSON
Corporation Counsel

KATHERINE J. WEALL
Senior Counsel
kweall@law.nyc.gov
Phone: (212) 356-5055
Mobile: (646)-370-0051

December 14, 2020

By ECF

Honorable Ona T. Wang
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: Robert Ashley v. Gonzalez, et al., 19-civ-6282 (AJN) (OTW)

Your Honor:

I represent defendant Correction Officers Anthony Dinicola and Adam Gonzalez in this action. I write pursuant to the Court's order of December 1, 2020, requiring the parties to file a new proposed discovery schedule by today, December 14, 2020.

Defendants have already produced all of the documents in their possession to Mr. Ashley, and do not anticipate that Mr. Ashley has any documents to produce to us. The only outstanding discovery is therefore depositions. I wrote to Mr. Ashley on December 2, 2020, proposing that all depositions be taken by January 30, 2020 and that discovery close on February 15, 2020. In that letter, I advised him that, if I had not heard back from him by December 11, 2020, I would assume his consent to this schedule and submit this proposal to the Court. I have not yet received a response from him.

Defendants therefore respectfully request that the Court enter the above proposed schedule for depositions and the close of discovery.

Respectfully submitted,

/s/ *Katherine J. Weall*

Katherine J. Weall
Senior Counsel

cc: Robert Ashley (By U.S. Mail)
Plaintiff Pro Se

Gouverneur Correctional Facility
112 Scotch Settlement Road
Gouverneur, NY 13642

Application granted. Depositions to be completed by January 30, 2021; discovery to be completed by February 15, 2021. By January 11, 2021, Defendants shall submit a proposed order for Plaintiff's deposition. Joint status letter due February 16, 2021.

ECF 91 resolved.

The Clerk of Court is respectfully directed to mail a copy of this Order to the pro se Plaintiff.

SO ORDERED.

A handwritten signature in blue ink, appearing to read 'Ona T. Wang', is written over a horizontal line.

Ona T. Wang Dec. 17, 2020
U.S.M.J.